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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 ENTROPIC COMMUNICATIONS, LLC,

16 Plaintiff,

17 v.

18 DISH NETWORK CORPORATION;
19 DISH NETWORK LLC; DISH
20 NETWORK SERVICE, LLC; and
21 DISH NETWORK CALIFORNIA
22 SERVICE CORPORATION,

23 Defendants.

Case No.: 2:23-cv-01043

**NOTICE OF RELATED CASES
PURSUANT TO L.R. 83-1.3.1**

Pursuant to Local Rule 83-1.3.1, Plaintiff Entropic Communications, LLC (“Entropic”) hereby gives notice that the instant action is related to the following cases currently pending before Judge John W. Holcomb:

- *Entropic Communications, LLC v. DIRECTV, LLC, et al.*, Case No. 2:22-cv-07775-JWH-JEM, filed March 9, 2022 (C.D. Cal.) (“DTV Action”); and
- *Entropic Communications, LLC v. DISH Network Corporation, et al.*, Case No. 2:22-cv-07959-JWH-JEM, filed March 9, 2022 (C.D. Cal.) (“DISH Action”) (consolidated with the DTV Action, [see Dkt. # 52]).

Local Rule 83-1.3.1 states that cases are related if they “(a) arise from the same or a closely related transaction, happening, or event; (b) call for determination of the same or substantially related or similar questions of law and fact; or (c) for other reasons would entail substantial duplication of labor if heard by different judges.” As discussed below, the instant action is related to the DTV Action and DISH Action (together, the “DTV/DISH Actions”) on the basis of all three elements weighing in favor of their being heard by the same judge (as well as being heard at the same time).

Pursuant to the December 13, 2022 Minute Order issued by the Court in the DTV Action [Dkt. # 176], the DTV Action and DISH Action are deemed related and have been consolidated, with the DTV Action as the lead case. The DTV/DISH Actions relate to the infringement of Entropic’s patents by telecommunication products and/or services provided by the defendants.

The instant action and the DISH Action arise from the same or a closely related transaction, happening, or event and should be deemed related for the following reasons. First, the instant action is directed to the infringement of Entropic’s patents that incorporate various elements of technology set forth in the Multimedia over Coax Alliance standards (the “MoCA” standards) by DISH Network Corporation, DISH Network LLC, DISH Network Service, LLC, and DISH Network California Service Corporation (collectively, the “DISH Defendants”), which are the same defendants as in the DISH Action. Second, the accused products in the instant action include the DISH

1 Hopper and Joey products, and the accused services are provided by the DISH
2 Defendants by means of the accused products. These are the same accused products and
3 services accused of infringement in the DISH Action. Entropic is the sole plaintiff in
4 both the instant action and the DTV/DISH Actions. Accordingly, L.R. 83-1.3.1(a)
5 supports a finding that these cases are related.

6 The instant action and the DISH Action call for determination of the same or
7 substantially related or similar questions of law and fact. For example, both actions will
8 deal with the development, use, and sale of the DISH Defendants' accused products and
9 services. Additionally, discovery issues—including witnesses and documents in the
10 DISH Defendants' custody related to the development and use of their
11 telecommunications products and services—will be the substantially similar between
12 the cases, which would lead to increased efficiency if the instant action is deemed
13 related to the DTV/DISH Actions. The same third parties will be at issue in the instant
14 action and the DTV/DISH Actions as the accused products in all three cases incorporate
15 the same or similar chips from third party manufacturer Broadcom. Thus, L.R. 83-
16 1.3.1(b) also supports a finding that these cases are related.

17 The instant action and the DISH Action should be deemed related for other
18 reasons to avoid substantial duplication of labor if heard by different judges. For
19 example, discovery disputes, potential defenses asserted by the DISH Defendants, and
20 any other disputes between the DISH Defendants and Entropic are likely to be similar.
21 As such, if these cases were heard by different judges, there would be substantial
22 duplication of labor because both judges would be required to address and adjudicate
23 the same factual and legal issues. Accordingly, L.R. 83-1.3.1(c) supports a finding that
24 these cases are related.

25 For the foregoing reasons, Entropic believes that the instant action and the
26 DTV/DISH Actions clearly qualify as related cases, and thus the instant action should
27 also be heard by Judge John W. Holcomb.
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1 Lastly, Entropic is concurrently filing two other complaints in this District Court
2 directed to infringement of the same patents asserted in the instant action, which as
3 noted above incorporate various elements of technology set forth in the MoCA
4 standards. The first of those complaints is for patent infringement by Comcast
5 Corporation, Comcast Cable Communications, LLC, and Comcast Cable
6 Communications Management, LLC by telecommunication products and/or services
7 provided by the defendants. The second of those concurrently filed complaints is for
8 patent infringement by Cox Communications, Inc., CoxCom, LLC, and Cox
9 Communications California, LLC by telecommunication products and/or services
10 provided by the defendants. As such, Entropic asks the Court to deem the forthcoming
11 actions as related to the instant action as well, and will be providing separate notices
12 detailing the specific reasons pursuant to L.R. 83-1.3.1.

13 Dated: February 10, 2023

14 By: /s/ Christina N. Goodrich

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